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SITE SUMMARY AND HRS SCORE
PRIDCO BUILDING NOS. L-336-0-70-9-0 & L-336-0-70-11-0 SITE

The PRIDCO Building Nos. L-336-0-70-9-0 & L-336-0-70-11-0 site (hereafter referred to as "the site") (EPA ID No. PRN000202721) is a warehouse facility of approximately 2.5 acres in an industrial park setting; a residential area is located to the north. The facility building is centrally located on the site, with a paved parking lot and loading docks on the west and east sides of the building, respectively. Currently, the property is owned by Pet Plastics, LLC (Pet Plastics), which plans to utilize the building as a warehouse; Pet Plastics also operates out of multiple adjacent buildings within the industrial park. The entire property is completely fenced with access through a secure gate.

The subject property was originally developed by Puerto Rico Industrial Development Company (PRIDCO) as Urban Zone L-336-0-70 Lots 9 and 11 in the mid-1970s. In April 1991, Westinghouse de P.R. (Westinghouse) purchased the property from PRIDCO. The information provided by PRIDCO does not specify the occupancy and use of the property prior to 1991. Internet searches for Westinghouse indicate that the company provides fuel, services, technology, plant design, and equipment to utility customers and others in the power industry, as well as lighting and other electronic products. Olay Company Inc. (Olay), a subsidiary of Procter & Gamble, purchased the property in June 2009 from BC Investment Group, Inc. and used it for storage in connection with the company's adjacent manufacturing facility; Olay referred to the warehouse as "Building E". In August 2001, Puerto Rico Environmental Quality Board (PREQB) submitted a Pre-Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) Screening Assessment Checklist/Decision Form for the Olay Company, Inc. (Lots 10, 11, 12, and 13); the pre-CERCLIS screening included a portion of the subject property (i.e., Lot 11), but Lot 9 was not included. In November 2016, Pet Plastics purchased the property from Procter & Gamble; the property is currently vacant.

In 2006, Weston Solutions, Inc. (WESTON®) and U.S. Environmental Protection Agency (EPA) personnel mobilized to the Central Puerto Rico Aqueduct and Sewer Authority (PRASA) Laboratory to review quarterly public well system organic analytical data for January 2002 through September 2006. WESTON and EPA reviewed the quarterly monitoring data for PRASA-operated wells and filtration plants throughout Puerto Rico and identified public wells in Cayey as exhibiting volatile organic compound (VOC) contamination. Analytical results for groundwater samples collected by WESTON in December 2008 confirmed the presence of trichloroethylene (TCE) at levels exceeding the Hazard Ranking System (HRS) Level I benchmark and tetrachloroethylene (PCE) above detection limits in Cayey drinking water wells, including University of Puerto Rico (UPR) Cayey Wells 1 and 2, located on the UPR-Cayey campus approximately 1.5 to 1.75 miles southwest of the site, and the inactive PRASA Bungalo/Montellano well, located approximately 0.75 mile south-southwest of the site.

In an attempt to identify potential sources of the groundwater contamination detected in the Cayey wells, pre-CERCLIS screening activities for the subject site were conducted under EPA's Cayey Site Discovery Initiative (SDI) in 2009. As part of the pre-CERCLIS screening,

WESTON conducted a site reconnaissance and attempted to gather background information on historical site operations. The site was recommended for further assessment under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) based on the incomplete historical record of operations at the site.

On June 17, 2016, WESTON conducted a follow-up on-site reconnaissance as part of the Site Inspection (SI) evaluation of the site. The reconnaissance included an interview with Proctor & Gamble personnel (site operator at the time of the reconnaissance) and a site walk where WESTON personnel observed site features. The exterior of the facility was noted to be clean and well-maintained. An aboveground storage tank thought to hold emergency, non-potable water is located east of the on-site vacant warehouse.

In July 2016, an Abbreviated Preliminary Assessment (APA) Checklist was completed for the site. Based on the incomplete historical record regarding previous operations, the limited PRIDCO files and information, the historical industry and manufacturing conducted at the site that may have used hazardous substances in the manufacturing process or as a solvent for degreasing activities, and the unknown historical housekeeping processes, the site was recommended for further assessment under CERCLA.

On January 23 and 24, 2017, as part of the SI evaluation of the site, WESTON personnel collected 16 soil samples from five boreholes advanced throughout the site using Geoprobe® direct-push technology. Additionally, regional background samples were collected on October 7, 2016 from a representative location unaffected by site activities. Groundwater was not encountered at any of the on-site or regional background sample locations. Based on the incomplete historical record and absence of sampling data for the site, the samples were submitted for full-scan analyses (i.e., Target Analyte List [TAL] VOCs, TAL semivolatile organic compounds [SVOCs], TAL Pesticides, TAL Aroclors [i.e., PCBs]; and TAL inorganics including mercury [Hg] and cyanide [CN]) through the EPA Contract Laboratory Program (CLP).

The on-site soil sample analytical results indicated non-detect values or values below Reporting Detection Limits (RDL) for all environmental organic analytes for all of the samples. Detections above the RDL were limited to the common laboratory contaminant dimethylphthalate, which was also reported in the background samples at similar concentrations and is therefore not considered to be site-related.

Inorganic analytical results for the on-site soil samples show detections of arsenic in all samples and manganese in one sample that exceed both the maximum regional background level and the EPA Risk Assessment Regional Screening Level (RSL). Therefore, arsenic and manganese are evaluated as indicative of a contaminated soil source and potentially attributable to historical operations at the site.

Barium and chromium each were detected in one soil sample at a concentration significantly above maximum regional background concentrations; however, these reported concentrations are orders of magnitude below their respective EPA Risk Assessment RSLs. Thallium was detected in all but four on-site soil samples at concentrations that exceed the EPA Risk Assessment RSL

but are below 3x the maximum regional background concentration; some of these thallium exceedances were estimated concentrations below RDLs. Cobalt was detected in three on-site soil samples at concentrations that exceed the EPA Risk Assessment RSL but are below 3x the maximum regional background concentration. Based on these considerations, barium, chromium, cobalt, and thallium are not included in the contaminated soil source evaluation.

Currently, the subject property is vacant and there are no employees working at the site. The property is fenced and accessible only through a gate at the front of the property. There is exposed soil outside the fenced perimeter near the sidewalk adjacent to the facility. There are no schools or daycares on or within 200 feet of the site. There are residences located within 200 feet of the property boundary. Potential runoff from the site is captured by municipal storm sewers. The storm sewers likely discharge to the nearest surface water, an unnamed tributary of Rio de la Plata approximately 1,500 feet east of the site. Surface water along the 15-mile pathway is used for drinking water by approximately 35,092 people and believed to be used for recreational activities, but it is not known to be used for consumption fishing. Groundwater withdrawals within 4 miles of the site serve a drinking water population of approximately 4,108 people. There is an off-site residential population of approximately 66,175 people, as well as several wetlands and other sensitive environments, within 4 miles of the site.

An HRS Quickscore (Version 3.1.1) analysis of the site was conducted on the basis of a potential release to groundwater, surface water, soil exposure, and air. An on-site soil waste source based on chemical analysis is documented and scored. Therefore, the HRS Quickscore analysis results in pathway scores of 4.03 for the groundwater migration pathway, 11.57 for the surface water migration pathway, 0.01 for the soil exposure pathway, and 0.62 for the air migration pathway. The resultant overall site score of 6.13 is less than the 28.50 score required for placement on the NPL. Based on these considerations, the PRIDCO Building Nos. L-336-0-70-9-0 & L-336-0-70-11-0 site is recommended for **NO FURTHER REMEDIAL ACTION PLANNED (NFRAP)**.